

To whom it may concern:

We have a small farm that grows organically grown food. Most of our customers agree that the FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, we believe that the FDA's labeling requirement should not be permitted to expire.

Yours truly,

Iris Briand & 

Miles Briand 

P.S. We urge you to place the comments received on the Internet so that the public can be informed about who is participating in this comment process. In other words, we'd like to see if and where we go on record as having contacted you regarding this issue, and would also like to contact other folks to network with on the issue.

98N-1038

C1337

Miles & Iris Briand
28281 Spencer Cr. Rd.
Eugene, OR 97405



Pockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

20857/0001

